

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO'S
RESPONSE TO ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL
CORP., AND AMBAC ASSURANCE CORPORATION'S MOTION TO EXTEND THE
ELECTION DEADLINE IN THE SOLICITATION PROCEDURES ORDER**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"),
as the sole Title III representative of the Commonwealth of Puerto Rico (the "Commonwealth"),
the Puerto Rico Public Buildings Authority ("PBA"), and the Employees Retirement System of

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and PBA, the “Debtors”), pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submits this response to the *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Ambac Assurance Corporation to Extend the Election Deadline in the Solicitation Procedures Order* [ECF No. 18284] (the “Extension Motion”). In support, the Oversight Board respectfully states as follows:

1. The Oversight Board does not object to the Court’s entry of an order clarifying that the Election Deadline³ is extended to October 18, 2021 at 5:00 p.m. (Atlantic Time) to coincide with the Voting Deadline currently established. Accordingly, the Oversight Board does not object to the entry of the proposed order annexed as Exhibit “A” to the Extension Motion. The Oversight Board reserves all rights to request further modifications of all applicable deadlines.

Dated: September 30, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen
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² PROMESA is codified at 48 U.S.C. §§ 2101–2241.

³ See *Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice And Confirmation Schedule, (IV) Approving Solicitation Packages And Distribution Procedures, (V) Approving Forms Of Ballots, And Voting And Election Procedures, (VI) Approving Notice Of Non-Voting Status, (VII) Fixing Voting, Election, And Confirmation Deadlines, And (VIII) Approving Vote Tabulation Procedures* (ECF No. 17639, the “Solicitation Procedures Order”). All capitalized terms used in this Response but not defined herein shall have the meanings ascribed to them in the *Solicitation Procedures Order* or the Plan, as applicable.

Attorneys for the Financial Oversight and Management Board as representative for the Debtors

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